Applicants respectfully request consideration of the subject application. This Response is submitted in response to the Office Action mailed January 8, 2006. Claims 1-30 stand rejected. In this Amendment, claims 1, 15, 21 and 28 have been amended. No new matter has been added.

Claim rejections under 35 U.S.C. § 102(b) and 103

The Examiner has rejected claims 1-11 and 15-20 under 35 U.S.C. § 103(a) as being unpatentable over Bennett in view of Uppaluru. The Examiner has also rejected claims 12-14 under 35 U.S.C. § 103 (a) as being unpatentable over Bennett in view of Uppaluru and further in view of Denneberg et al. (U.S. Patent No. 6,724,864). The Examiner has rejected claims 21-27 under 35 U.S.C. § 103(a) as being unpatentable over Uppaluru in view of Bennett.

Applicant respectfully submits the cited art fails to teach or suggest, *inter alia*, as required by claim 1: "enabling the user to access a domain of the enterprise system after logging into the enterprise data system, each domain corresponding to a particular object or type of data; enabling the user to request an ad hoc query be performed against data stored by the accessed domain using a spoken natural language query and enabling the user to navigate in the accessed domain using spoken navigation" Similar limitations are included in independent claims 15 and 21.

Bennett is directed to a speech recognition system which is used to search for a spoken answer to a user's spoken query, which is in the form of question. Bennett does not teach or suggest an enterprise data system that includes a plurality of domains, the domains comprising data corresponding to a particular object or data type.

In contrast, the presently claimed invention allows users to search for data in a particular domain using either spoken navigation, natural language query commands, or a combination of spoken navigation and natural language query commands.

In addition, as discussed in the Amendment and Response mailed November 16, 2005, Applicants submit Bennett does not teach or suggest converting the spoken natural language query into a data query and executing the data query to retrieve any data in the enterprise data system corresponding to the ad hoc query. Instead, Bennett retrieves a data query from a database, and then provides the user with an answer to the data query retrieved from the database.

Uppaluru is directed to an accessible voice web. Upalluru discusses a personal voice web system in which the subscriber navigates among pages in the personal voice web using speech. Uppaluru does not disclose an enterprise data system that includes a plurality of domains, the domains comprising data corresponding to a particular object or data type.

In contrast, the present invention comprises a system and method that enables various users to access data stored in an enterprise data system after logging into the system. The user identifies a domain of information to be accessed. Once the domain is accessed, data in the domain can be navigated using voice commands or a natural-language ad hoc query can be performed against the data.

Thus, applicants respectfully submit that independent claims 1, 15 and 21 are patentable over the cited art. As claims 2-14, 16-20 and 22-27 depend from independent claims 1, 15 and 21, respectively, dependent claims 2-14, 16-20 and 22-27 are also patentable over the cited art.

<u>Claim rejection under 35 U.S.C. § 102(e)</u>

The Examiner has rejected claims 28-29 under 35 U.S.C. § 102(e) as being anticipated by Bennett et al. (U.S. Patent No. 6,633,846, hereinafter "Bennett").

Applicant respectfully submits that Bennett, fails to teach or suggest, *inter alia*, as required by claim 28: "if pre-compiled data corresponding to the data request is stored in the

local database, retrieving data from the local database corresponding to the ad hoc query; and if

pre-compiled data corresponding to the data request is not stored in the local database, retrieving

data from the enterprise data system corresponding to the ad hoc query."

Bennett is directed to a speech recognition system which is used to search for a spoken

answer to a user's spoken query.

Bennett does not teach or suggest first searching the local database to determine if the

data request corresponds to pre-compiled data stored at the local database, and retrieving data

from the local database if the pre-compiled data corresponds to the requested data. And, if pre-

compiled data corresponding to the data request is not in the local database, then searching the

enterprise data system.

In contrast, the presently claimed invention requires the local database to be apart from

the enterprise data system, and also requires storing pre-compiled data in a local database. In

addition, the local database is first searched when a data request is received. As disclosed in the

specification, by pre-compiling some of the data, the speed of many data requests made by users

of the system increases. See pages 33-37 of the present specification.

In addition, as discussed in the Amendment and Response mailed November 16, 2005,

Applicants submit Bennett does not teach or suggest a local database that is apart from the

enterprise data system. Bennett only discloses a single database 188, as shown in Figure 1,

located at the server. In addition, Bennett does not teach storing pre-compiled data in a local

database. As illustrated in Figure 11C, the answer is compressed after the answer is extracted

from a file and then sent to the client. There is no indication that any data is stored in a local

database. The Examiner points to Col. 25, lines 19-35 as teaching the above limitations.

Applicants respectfully disagree. Bennett discloses that the questions are stored in a database,

but does not teach that any data is pre-compiled nor does Bennett teach a database, in which the data is stored, that is apart from the enterprise data system.

Thus, applicants respectfully submit that independent claim 28 is patentable over the cited art. As claims 29-30 depend from independent claim 28, dependent claims 29-30 are also patentable over the cited art.

Deposit Account Authorization

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Jennifer Hayes at (408) 720-8300.

Respectfully submitted,

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